

EXHIBIT A



**Service of Process
Transmittal**

02/03/2021

CT Log Number 538991651

TO: Legal Sop, Melissa Partlow
Best Buy Enterprise Services, Inc.
7601 PENN AVE S
RICHFIELD, MN 55423-3683

RE: Process Served in New Jersey

FOR: Best Buy Stores, L.P. (Domestic State: VA)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: David Derhi and Tikva Derhi, etc., Pltfs. vs. Christoph Hammond, et al., Dfts. // To:
Best Buy Stores
Name discrepancy noted.

DOCUMENT(S) SERVED: -

COURT/AGENCY: None Specified
Case # MIDL696120

NATURE OF ACTION: Personal Injury - Vehicle Collision

ON WHOM PROCESS WAS SERVED: C T Corporation System, West Trenton, NJ

DATE AND HOUR OF SERVICE: By Process Server on 02/03/2021 at 15:40

JURISDICTION SERVED : New Jersey

APPEARANCE OR ANSWER DUE: None Specified

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: CT has retained the current log, Retain Date: 02/03/2021, Expected Purge Date:
02/08/2021

Image SOP

Email Notification, Legal Sop ctlegalsop@bestbuy.com

REGISTERED AGENT ADDRESS: C T Corporation System
820 Bear Tavern Road
West Trenton, NJ 08628
866-331-2303
CentralTeam1@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

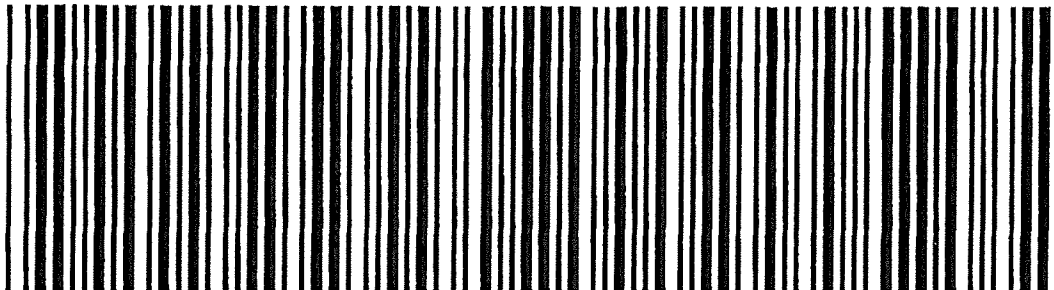


PROCESS SERVER DELIVERY DETAILS

Date: Wed, Feb 3, 2021

Server Name: Drop Service

Entity Served	BEST BUY STORES
Agent Name	
Case Number	MIDL696120
Jurisdiction	NJ



LAW OFFICE OF ANDREW S. BLUMER
A Limited Liability Company
Andrew S. Blumer, Esq.
NJ Attorney ID No. 032631994
4255 Route 9 North, Bldg. 5, S
Freehold, New Jersey 07728
732.303.6430
Attorneys for Plaintiff

DAVID DERHI and TIKVA DERHI,
his wife,
Plaintiffs,

v.

CHRISTOPH HAMMOND; BEST BUY
STORES; BEST BUY; BEST BUY CO.,
INC.; BEST BUY STORES, L.P.; ABC
Corporations (1-10), DEF Partnerships (1-10),
GHI Limited Liability Companies (1-10), and
John/Jane Does (1-10),
Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-6961-20

CIVIL ACTION

SUMMONS

THE STATE OF NEW JERSEY, to the Above-Named Defendant:

Best Buy Stores

C/o Michael Moran, President
7601 Penn Ave S.
Richfield, MN 55423

The Plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey.

The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written answer or motion and proof of service with the Deputy Clerk of the Superior Court in the County listed above within thirty-five (35) days from the date you received this Summons, not counting the date you received it. A \$135.00 filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the Deputy Clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to Plaintiff's attorney whose name and

address appear above, or to Plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and Case Information Statement) if you want the Court to hear your defense.

If you do not file and serve a written answer or motion within thirty-five (35) days, the Court may enter a judgment against you for the relief Plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford to pay an attorney, you may call the Legal Services Office in the County where you live. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is provided.

/s/ M. M. S
MICHELLE M. SMITH, ACTING CLERK
SUPERIOR COURT OF NEW JERSEY

Dated: January 27, 2021

Name/Address of Defendant to be served:

Best Buy Stores
C/o Michael Moran, President
7601 Penn Ave S.
Richfield, MN 55423

Directory of Superior Court Deputy Clerk's Offices County Lawyer Referral and Legal Services Offices

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401

LAWYER REFERRAL

(609) 345-3444

LEGAL SERVICES

(609) 348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601

LAWYER REFERRAL

(201) 488-0044

LEGAL SERVICES

(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060

LAWYER REFERRAL

(609) 261-4862

LEGAL SERVICES

(609) 261-1088

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice
1st Fl., Suite 150
101 South 5th Street
Camden, NJ 08103

LAWYER REFERRAL

(856) 482-0618

LEGAL SERVICES

(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Cape May Court House, NJ 08210

LAWYER REFERRAL

(609) 463-0313

LEGAL SERVICES

(609) 465-3001

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad Street
P.O. Box 10
Bridgeton, NJ 08302

LAWYER REFERRAL

(856) 696-5550

LEGAL SERVICES

(856) 691-0494

ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

LAWYER REFERRAL

(973) 622-6204

LEGAL SERVICES

(973) 624-4500

GLOUCESTER COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Fl., Court House
1 North Broad Street
Woodbury, NJ 08096

LAWYER REFERRAL

(856) 848-4589
LEGAL SERVICES
(856) 848-5360

HUDSON COUNTY:

Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House--1st Floor
583 Newark Ave.
Jersey City, NJ 07306

LAWYER REFERRAL

(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY:

Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822

LAWYER REFERRAL

(908) 236-6109
LEGAL SERVICES
(908) 782-7979

MERCER COUNTY:

Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 S. Broad Street, P.O. Box 8068
Trenton, NJ 08650

LAWYER REFERRAL

(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY:

Deputy Clerk of the Superior Court,
Middlesex Vicinage
2nd Floor - Tower
56 Paterson Street, P.O. Box 2633
New Brunswick, NJ 08903-2633

LAWYER REFERRAL

(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY:

Deputy Clerk of the Superior Court
Court House
P.O. Box 1269
Freehold, NJ 07728-1269

LAWYER REFERRAL

(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY:

Morris County Courthouse
Civil Division
Washington and Court Streets
P. O. Box 910
Morristown, NJ 07963-0910

LAWYER REFERRAL

(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:

Deputy Clerk of the Superior Court
118 Washington Street, Room 121
P.O. Box 2191
Toms River, NJ 08754-2191

LAWYER REFERRAL

(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505

LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

SALEM COUNTY:

Deputy Clerk of the Superior Court
Attn: Civil Case Management Office
92 Market Street
Salem, NJ 08079

LAWYER REFERRAL
(856) 935-5629
LEGAL SERVICES
(856) 691-0494

SOMERSET COUNTY:

Deputy Clerk of the Superior Court
Civil Division
P.O. Box 3000
40 North Bridge Street
Somerville, N.J. 08876

LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY:

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

UNION COUNTY:

Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073

LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500

LAWYER REFERRAL
(908) 859-4300
LEGAL SERVICES
(908) 475-2010

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LAW OFFICE OF ANDREW S. BLUMER
FREEHOLD OFFICE PLAZA
4255 ROUTE 9 NORTH
BLDG. 5, SUITE D
FREEHOLD, NEW JERSEY 07728
(732) 303-6430
Our File No.: BI-DER-001
Andrew S. Blumer, Esq.
Attorney ID# 032631994
Attorneys for Plaintiff(s):

DAVID DERHI and TIKVA DERHI, his
wife
Plaintiffs,

v.

CHRISTOPH HAMMOND; BEST BUY
STORES; BEST BUY; BEST BUY CO.,
INC.; BEST BUY STORES, L.P.; ABC
Corporations (1-10), DEF Partnerships (1-10),
GHI Limited Liability Companies (1-10) and
John/Jane Does (1-10)

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-_____

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff, DAVID DERHI and TIKVA DERHI, residing at 20 Carter Drive, Township of Marlboro County of Monmouth, State of New Jersey, by way of Complaint against the Defendants say:

FIRST COUNT

1. On October 4, 2018 at approximately 2:35 p.m., the Plaintiff, DAVID DERHI, was operating an automobile that was traveling northbound on River Avenue and slowing to stop/stopping in traffic, in the Township of Lakewood, County of Ocean, State of New Jersey.
2. At the time and place aforesaid, Defendants CHRISTOPH HAMMOND was the operator of a vehicle traveling directly behind Plaintiff, in the same lane of traffic.
3. At the same time and place aforesaid, the Defendant, CHRISTOPH HAMMOND

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owed a duty of reasonable care to the Plaintiff, DAVID DERHI, with respect to the operation of the vehicle he was driving.

4. At the time and place aforesaid, Defendants, CHRISTOPH HAMMOND breached this duty of care since he operated his vehicle in a negligent, grossly negligent, and/or reckless manner by, *inter alia*, failing to make proper observations and keep proper attention, failing to keep his/her vehicle under control, following too closely behind the plaintiff, travelling too fast for the circumstances then and there existing, driving distracted and failing to otherwise drive with reasonable and due care under the circumstances since CHRISTOPH HAMMOND failed to control his/her vehicle and struck Plaintiff's vehicle in the rear while the Plaintiff was properly and gradually slowing to stop/stopping in traffic; and/or improperly maintained his vehicle.

5. As a direct and proximate result of the aforesaid negligence, gross negligence and/or recklessness of Defendant CHRISTOPH HAMMOND, Plaintiff, DAVID DERHI, was caused to sustain severe and permanent personal injuries, to suffer from great pain, was forced to seek medical aid and attention, was caused to suffer financial loss including property damage, prevented from attending to his/her usual business and/or employment or other activities, and has been left with permanent injuries and disabilities that will, in the future, cause him/her to suffer great pain, require medical aid and/or attention and will otherwise cause him/her to suffer from said injuries.

WHEREFORE, the Plaintiff, DAVID DERHI, demands judgment against the Defendant, CHRISTOPH HAMMOND and Co-Defendants, individually, jointly, concurrently and severally for damages, compensatory and punitive, interest, attorney's fees, costs of suit, and such other and further relief that the Court may deem just and equitable.

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SECOND COUNT

1. Plaintiffs repeat and incorporate each and every allegation contained within the First Count of the Complaint as if set forth at length herein.

2. At the time and place aforesaid, Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., was/were the owner(s) of the vehicle that was being operated by the Defendant, CHRISTOPH HAMMOND. Further, at all times relevant herein, one or more of said Defendants was/were entities that was/were and is conducting business in Middlesex County, New Jersey.

3. Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., negligently entrusted Defendant, CHRISTOPH HAMMOND, with said vehicle, negligently maintained said vehicle and/or allowed the Defendant, CHRISTOPH HAMMOND, to operate their/its vehicle as its/his/her agent, servant and/or employee.

4. Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., is vicariously liable for any conduct, including negligence, gross negligence and/or recklessness of Defendant, CHRISTOPH HAMMOND.

5. As a direct and proximate result of the aforesaid conduct, including negligence, gross negligence and/or recklessness of the Defendant, CHRISTOPH HAMMOND and Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., Plaintiff, DAVID DERHI, was caused to sustain severe and permanent personal injuries, to suffer from great pain, was forced to seek medical aid and attention, was caused to suffer financial loss including property damage, prevented from attending to his/her usual business and/or employment or other activities, and has been left with permanent injuries and disabilities that will,

MID-L-006961-20 10/02/2020 5:25:56 PM Pg 4 of 7 Trans ID: LCV20201750341

in the future; cause him/her to suffer great pain, require medical aid and/or attention and will otherwise cause him/her to suffer from said injuries.

WHEREFORE, the Plaintiff, DAVID DERHI, demands judgment against the Defendants, Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., and CHRISTOPH HAMMOND, and Co-Defendants, individually, jointly, concurrently and severally for damages, compensatory and punitive, interest, attorney's fees, costs of suit, and such other and further relief that the Court may deem just and equitable.

THIRD COUNT

1. Plaintiffs repeat each and every allegation contained in the First and Second Counts of this Complaint as if the same were set forth verbatim and at length herein.

2. At the time and place aforesaid, the Plaintiff, TIKVAH DERHI, was the lawfully wedded wife of Plaintiff, DAVID DERHI.

3. As a direct and proximate result of the injuries suffered by Plaintiff, DAVID DERHI, as aforesaid, the Plaintiff, TIKVAH DERHI, has and will in the future, suffer the loss of the usual services, companionship, society and consortium of her husband, DAVID DERHI, and has been required to provide special services and care for Plaintiff, DAVID DERHI.

WHEREFORE, the Plaintiff, TIKVAH DERHI, demands judgment against the Defendants and Co-Defendants, individually, jointly, concurrently and severally for damages, interest, attorney's fees, costs of suit, and such other and further relief that the Court may deem just and equitable.

MID-L-006961-20 10/02/2020 5:25:56 PM Pg 5 of 7 Trans ID: LCV20201750341

FOURTH COUNT

1. Plaintiffs repeat and incorporate each and every allegation contained within the First, Second and Third Counts of the Complaint as if set forth at length herein.

2. Defendants John/Jane Does (1-10), ABC Corporations (1-10), DEF Partnerships (1-10) and GHI Limited Liability Corporations (1-10) are named fictitiously due to the Plaintiff's lack of knowledge and belief as to the true identities of said Defendants. At such time as the Plaintiff learns the true identities of said Defendants, this Complaint will be amended to reflect same.

3. Defendants John/Jane Does (1-10), ABC Corporations (1-10), DEF Partnerships (1-10) and GHI Limited Liability Companies (1-10) are individuals and/or entities who had an ownership interest in the vehicle that was being operated by Defendant, CHRISTOPH HAMMOND, who negligently entrusted the vehicle to Defendant, CHRISTOPH HAMMOND, who negligently maintained, constructed, assembled and/or repaired the vehicle operated by Defendant, CHRISTOPH HAMMOND, who negligently designed, constructed, obstructed, repaired and/or maintained the roadway where the accident occurred, and/or Defendant, CHRISTOPH HAMMOND, was operating said vehicle as their agent, servant and/or employee at the time of the accident; and/or individually or through their agents, servants and/or employees negligently served alcohol to any of the parties while noticeably intoxicated and/or said Defendants are insurers from whom Plaintiff is entitled to PIP, medical payment coverage or other insurance benefits.

4. As a direct and proximate result of the aforesaid conduct, including negligence of the Defendants, the Plaintiff, DAVID DERHI, was caused to sustain severe and permanent personal injuries, to suffer from great pain, was forced to seek medical aid and attention, was caused to suffer

MID-L-006961-20 10/02/2020 5:25:56 PM Pg 6 of 7 Trans ID: LCV20201750341

financial loss including property damage, prevented from attending to his/her usual business and/or employment or other activities, and has been left with permanent injuries and disabilities that will, in the future, cause him/her to suffer great pain, require medical aid and/or attention and will otherwise cause him/her to suffer from said injuries.

WHEREFORE, the Plaintiff, DAVID DERHI, demand judgment against the Defendants, JOHN/JANE DOES (1-10), ABC Corporations (1-10), DEF Partnerships (1-10), GHI Limited Liability Companies (1-10) and Co-Defendants, individually, jointly, concurrently, severally and individually, for damages, interest, attorney's fees, costs of suit, and such other and further relief that the Court may deem just and equitable.

DESIGNATION OF TRIAL COUNSEL

Andrew S. Blumer, Esq., is hereby designated as trial counsel in the above-captioned matter.

JURY DEMAND

TAKE NOTICE that the Plaintiffs demand that the issues herein be tried by a jury.

CERTIFICATION PURSUANT TO R. 4:5-1

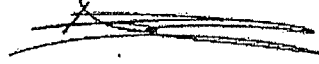
In accordance with Rule 4:5-1, I hereby certify to the best of my knowledge that the matter in controversy in this/her action is not the subject of any other action, and that no such action or arbitration is presently contemplated.

MID-L-006961-20 10/02/2020 5:25:56 PM Pg 7 of 7 Trans ID: LCV20201750341

CERTIFICATION PURSUANT TO RULE 1:38-7(b)

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

LAW OFFICE OF ANDREW S. BLUMER
A LIMITED LIABILITY COMPANY
Attorneys for Plaintiffs


BY: _____
Andrew S. Blumer, Esq.

Dated: October 2, 2020

MID-L-006961-20 10/02/2020 5:25:56 PM Pg 1 of 2 Trans ID: LCV20201750341

Civil Case Information Statement

Case Details: MIDDLESEX | Civil Part Docket# L-006961-20

Case Caption: DERHI DAVID VS HAMMOND CHRISTOPH

Case Initiation Date: 10/02/2020

Attorney Name: ANDREW S BLUMER

Firm Name: ANDREW S. BLUMER

Address: BLDG 5, STE D 4255 RTE 9N
FREEHOLD NJ 07728

Phone: 7323036430

Name of Party: PLAINTIFF : DERHI, DAVID

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same
transaction or occurrence)? NO

Are sexual abuse claims alleged by: DAVID DERHI? NO

Are sexual abuse claims alleged by: TIKVA DERHI? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the
court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

10/02/2020

Dated

/s/ ANDREW S BLUMER

Signed

MID-L-006961-20 10/02/2020 5:25:56 PM Pg 2 of 2 Trans ID: LCV20201750341



**Service of Process
Transmittal**

02/03/2021

CT Log Number 538991628

TO: Legal Sop, Melissa Partlow
Best Buy Enterprise Services, Inc.
7601 PENN AVE S
RICHFIELD, MN 55423-3683

RE: Process Served in New Jersey

FOR: Best Buy Co., Inc. (Domestic State: MN)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: David Derhi and Tikva Derhi, etc., Pltfs. vs. Christoph Hammond, et al., Dfts. // To: Best Buy Co., Inc.

DOCUMENT(S) SERVED: -

COURT/AGENCY: None Specified
Case # MIDL696120

NATURE OF ACTION: Personal Injury - Vehicle Collision

ON WHOM PROCESS WAS SERVED: C T Corporation System, West Trenton, NJ

DATE AND HOUR OF SERVICE: By Process Server on 02/03/2021 at 15:40

JURISDICTION SERVED : New Jersey

APPEARANCE OR ANSWER DUE: None Specified

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: CT has retained the current log, Retain Date: 02/03/2021, Expected Purge Date: 02/08/2021
Image SOP
Email Notification, Legal Sop ctlegalsop@bestbuy.com

REGISTERED AGENT ADDRESS: C T Corporation System
820 Bear Tavern Road
West Trenton, NJ 08628
866-331-2303
CentralTeam1@wolterskluwer.com

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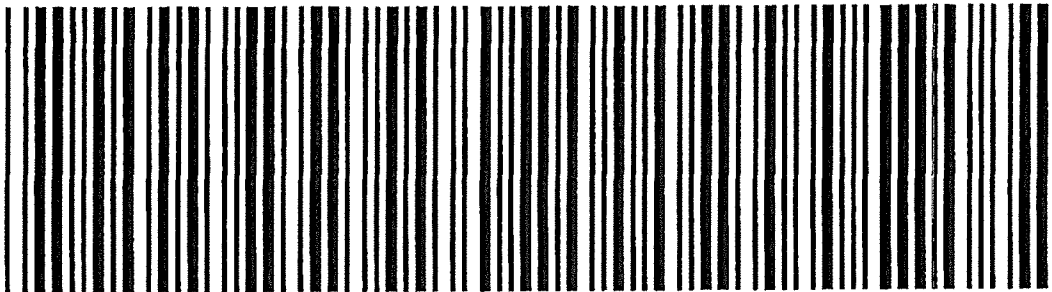


PROCESS SERVER DELIVERY DETAILS

Date: Wed, Feb 3, 2021

Server Name: Drop Service

Entity Served	BEST BUY CO., INC.
Agent Name	
Case Number	MIDL696120
Jurisdiction	NJ



LAW OFFICE OF ANDREW S. BLUMER
A Limited Liability Company
Andrew S. Blumer, Esq.
NJ Attorney ID No. 032631994
4255 Route 9 North, Bldg. 5, Suite D
Freehold, New Jersey 07728
732.303.6430
Attorneys for Plaintiff

DAVID DERHI and TIKVA DERHI,
his wife,

Plaintiffs,

v.

CHRISTOPH HAMMOND; BEST BUY
STORES; BEST BUY; BEST BUY CO.,
INC.; BEST BUY STORES, L.P.; ABC
Corporations (1-10), DEF Partnerships (1-10),
GHI Limited Liability Companies (1-10), and
John/Jane Does (1-10),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-6961-20

CIVIL ACTION

SUMMONS

THE STATE OF NEW JERSEY, to the Above-Named Defendant:

Best Buy Co., Inc.

C/o Michael Moran, President
7601 Penn Ave S.
Richfield, MN 55423

The Plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey.

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address appear above; or to Plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and Case Information Statement) if you want the Court to hear your defense.

If you do not file and serve a written answer or motion within thirty-five (35) days, the Court may enter a judgment against you for the relief Plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford to pay an attorney, you may call the Legal Services Office in the County where you live. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is provided.

/s/ M. M. S

MICHELLE M. SMITH, ACTING CLERK
SUPERIOR COURT OF NEW JERSEY

Dated: January 27, 2021

Name/Address of Defendant to be served:

Best Buy Co., Inc.
C/o Michael Moran, President
7601 Penn Ave S.
Richfield, MN 55423

**Directory of Superior Court Deputy Clerk's Offices
County Lawyer Referral and Legal Services Offices**

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401

LAWYER REFERRAL

(609) 345-3444

LEGAL SERVICES

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BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601

LAWYER REFERRAL

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LEGAL SERVICES

(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060

LAWYER REFERRAL

(609) 261-4862

LEGAL SERVICES

(609) 261-1088

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice
1st Fl., Suite 150
101 South 5th Street
Camden, NJ 08103

LAWYER REFERRAL

(856) 482-0618

LEGAL SERVICES

(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Cape May Court House, NJ 08210

LAWYER REFERRAL

(609) 463-0313

LEGAL SERVICES

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CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad Street
P.O. Box 10
Bridgeton, NJ 08302

LAWYER REFERRAL

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LEGAL SERVICES

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ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
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LAWYER REFERRAL

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Civil Division
65 Park Avenue
Flemington, NJ 08822

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(908) 782-7979

MERCER COUNTY:

Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 S. Broad Street, P.O. Box 8068
Trenton, NJ 08650

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MIDDLESEX COUNTY:

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Middlesex Vicinage
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New Brunswick, NJ 08903-2633

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Court House
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MORRIS COUNTY:

Morris County Courthouse
Civil Division
Washington and Court Streets
P. O. Box 910
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UNION COUNTY:

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LAWYER REFERRAL

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LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:

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Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500

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(908) 859-4300
LEGAL SERVICES
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MID-L-006961-20 10/02/2020 5:25:56 PM Pg 1 of 7 Trans ID: LCV20201750341

LAW OFFICE OF ANDREW S. BLUMER
FREEHOLD OFFICE PLAZA
4255 ROUTE 9 NORTH
BLDG. 5, SUITE D
FREEHOLD, NEW JERSEY 07728
(732) 303-6430
Our File No.: BI-DER-001
Andrew S. Blumer, Esq.
Attorney ID# 032631994
Attorneys for Plaintiff(s):

DAVID DERHI and TIKVA DERHI, his
wife
Plaintiffs,

v.

CHRISTOPH HAMMOND; BEST BUY
STORES; BEST BUY; BEST BUY CO.,
INC.; BEST BUY STORES, L.P.; ABC
Corporations (1-10), DEF Partnerships (1-10),
GHI Limited Liability Companies (1-10) and
John/Jane Does (1-10)

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-_____

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff, DAVID DERHI and TIKVA DERHI, residing at 20 Carter Drive, Township of Marlboro County of Monmouth, State of New Jersey, by way of Complaint against the Defendants say:

FIRST COUNT

1. On October 4, 2018 at approximately 2:35 p.m., the Plaintiff, DAVID DERHI, was operating an automobile that was traveling northbound on River Avenue and slowing to stop/stopping in traffic, in the Township of Lakewood, County of Ocean, State of New Jersey.
2. At the time and place aforesaid, Defendants CHRISTOPH HAMMOND was the operator of a vehicle traveling directly behind Plaintiff, in the same lane of traffic.
3. At the same time and place aforesaid, the Defendant, CHRISTOPH HAMMOND

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owed a duty of reasonable care to the Plaintiff, DAVID DERHI, with respect to the operation of the vehicle he was driving.

4. At the time and place aforesaid, Defendants, CHRISTOPH HAMMOND breached this duty of care since he operated his vehicle in a negligent, grossly negligent, and/or reckless manner by, *inter alia*, failing to make proper observations and keep proper attention, failing to keep his/her vehicle under control, following too closely behind the plaintiff, travelling too fast for the circumstances then and there existing, driving distracted and failing to otherwise drive with reasonable and due care under the circumstances since CHRISTOPH HAMMOND failed to control his/her vehicle and struck Plaintiff's vehicle in the rear while the Plaintiff was properly and gradually slowing to stop/stopping in traffic; and/or improperly maintained his vehicle.

5. As a direct and proximate result of the aforesaid negligence, gross negligence and/or recklessness of Defendant CHRISTOPH HAMMOND, Plaintiff, DAVID DERHI, was caused to sustain severe and permanent personal injuries, to suffer from great pain, was forced to seek medical aid and attention, was caused to suffer financial loss including property damage, prevented from attending to his/her usual business and/or employment or other activities, and has been left with permanent injuries and disabilities that will, in the future, cause him/her to suffer great pain, require medical aid and/or attention and will otherwise cause him/her to suffer from said injuries.

WHEREFORE, the Plaintiff, DAVID DERHI, demands judgment against the Defendant, CHRISTOPH HAMMOND and Co-Defendants, individually, jointly, concurrently and severally for damages, compensatory and punitive, interest, attorney's fees, costs of suit, and such other and further relief that the Court may deem just and equitable.

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SECOND COUNT

1. Plaintiffs repeat and incorporate each and every allegation contained within the First Count of the Complaint as if set forth at length herein.

2. At the time and place aforesaid, Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., was/were the owner(s) of the vehicle that was being operated by the Defendant, CHRISTOPH HAMMOND. Further, at all times relevant herein, one or more of said Defendants was/were entities that was/were and is conducting business in Middlesex County, New Jersey.

3. Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., negligently entrusted Defendant, CHRISTOPH HAMMOND, with said vehicle, negligently maintained said vehicle and/or allowed the Defendant, CHRISTOPH HAMMOND, to operate their/its vehicle as its/his/her agent, servant and/or employee.

4. Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., is vicariously liable for any conduct, including negligence, gross negligence and/or recklessness of Defendant, CHRISTOPH HAMMOND.

5. As a direct and proximate result of the aforesaid conduct, including negligence, gross negligence and/or recklessness of the Defendant, CHRISTOPH HAMMOND and Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., Plaintiff, DAVID DERHI, was caused to sustain severe and permanent personal injuries, to suffer from great pain, was forced to seek medical aid and attention, was caused to suffer financial loss including property damage, prevented from attending to his/her usual business and/or employment or other activities, and has been left with permanent injuries and disabilities that will,

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in the future, cause him/her to suffer great pain, require medical aid and/or attention and will otherwise cause him/her to suffer from said injuries.

WHEREFORE, the Plaintiff, DAVID DERHI, demands judgment against the Defendants, Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., and CHRISTOPH HAMMOND, and Co-Defendants, individually, jointly, concurrently and severally for damages, compensatory and punitive, interest, attorney's fees, costs of suit, and such other and further relief that the Court may deem just and equitable.

THIRD COUNT

1. Plaintiffs repeat each and every allegation contained in the First and Second Counts of this Complaint as if the same were set forth verbatim and at length herein.

2. At the time and place aforesaid, the Plaintiff, TIKVAH DERHI, was the lawfully wedded wife of Plaintiff, DAVID DERHI.

3. As a direct and proximate result of the injuries suffered by Plaintiff, DAVID DERHI, as aforesaid, the Plaintiff, TIKVAH DERHI, has and will in the future, suffer the loss of the usual services, companionship, society and consortium of her husband, DAVID DERHI, and has been required to provide special services and care for Plaintiff, DAVID DERHI.

WHEREFORE, the Plaintiff, TIKVAH DERHI, demands judgment against the Defendants and Co-Defendants, individually, jointly, concurrently and severally for damages, interest, attorney's fees, costs of suit, and such other and further relief that the Court may deem just and equitable.

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FOURTH COUNT

1. Plaintiffs repeat and incorporate each and every allegation contained within the First, Second and Third Counts of the Complaint as if set forth at length herein.

2. Defendants John/Jane Does (1-10), ABC Corporations (1-10), DEF Partnerships (1-10) and GHI Limited Liability Corporations (1-10) are named fictitiously due to the Plaintiff's lack of knowledge and belief as to the true identities of said Defendants. At such time as the Plaintiff learns the true identities of said Defendants, this Complaint will be amended to reflect same.

3. Defendants John/Jane Does (1-10), ABC Corporations (1-10), DEF Partnerships (1-10) and GHI Limited Liability Companies (1-10) are individuals and/or entities who had an ownership interest in the vehicle that was being operated by Defendant, CHRISTOPH HAMMOND, who negligently entrusted the vehicle to Defendant, CHRISTOPH HAMMOND, who negligently maintained, constructed, assembled and/or repaired the vehicle operated by Defendant, CHRISTOPH HAMMOND, who negligently designed, constructed, obstructed, repaired and/or maintained the roadway where the accident occurred, and/or Defendant, CHRISTOPH HAMMOND, was operating said vehicle as their agent, servant and/or employee at the time of the accident; and/or individually or through their agents, servants and/or employees negligently served alcohol to any of the parties while noticeably intoxicated and/or said Defendants are insurers from whom Plaintiff is entitled to PIP, medical payment coverage or other insurance benefits.

4. As a direct and proximate result of the aforesaid conduct, including negligence of the Defendants, the Plaintiff, DAVID DERHI, was caused to sustain severe and permanent personal injuries, to suffer from great pain, was forced to seek medical aid and attention, was caused to suffer

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financial loss including property damage, prevented from attending to his/her usual business and/or employment or other activities, and has been left with permanent injuries and disabilities that will, in the future, cause him/her to suffer great pain, require medical aid and/or attention and will otherwise cause him/her to suffer from said injuries.

WHEREFORE, the Plaintiff, DAVID DERHI, demand judgment against the Defendants, JOHN/JANE DOES (1-10), ABC Corporations (1-10), DEF Partnerships (1-10), GHI Limited Liability Companies (1-10) and Co-Defendants, individually, jointly, concurrently, severally and individually, for damages, interest, attorney's fees, costs of suit, and such other and further relief that the Court may deem just and equitable.

DESIGNATION OF TRIAL COUNSEL

Andrew S. Blumer, Esq., is hereby designated as trial counsel in the above-captioned matter.

JURY DEMAND

TAKE NOTICE that the Plaintiffs demand that the issues herein be tried by a jury.

CERTIFICATION PURSUANT TO R. 4:5-1

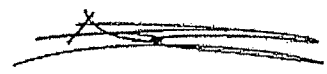
In accordance with Rule 4:5-1, I hereby certify to the best of my knowledge that the matter in controversy in this/her action is not the subject of any other action, and that no such action or arbitration is presently contemplated.

MID-L-006961-20 10/02/2020 5:25:56 PM Pg 7 of 7 Trans ID: LCV20201750341

CERTIFICATION PURSUANT TO RULE 1:38-7(b)

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

LAW OFFICE OF ANDREW S. BLUMER
A LIMITED LIABILITY COMPANY
Attorneys for Plaintiffs


BY: _____
Andrew S. Blumer, Esq.

Dated: October 2, 2020

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Civil Case Information Statement

Case Details: MIDDLESEX || Civil Part Docket# L-006961-20

Case Caption: DERHI DAVID VS HAMMOND CHRISTOPH

Case Initiation Date: 10/02/2020

Attorney Name: ANDREW S BLUMER

Firm Name: ANDREW S. BLUMER

Address: BLDG 5, STE D 4255 RTE 9N
FREEHOLD NJ 07728

Phone: 7323036430

Name of Party: PLAINTIFF : DERHI, DAVID

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same
transaction or occurrence)? NO

Are sexual abuse claims alleged by: DAVID DERHI? NO

Are sexual abuse claims alleged by: TIKVA DERHI? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the
court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

10/02/2020
Dated

/s/ ANDREW S BLUMER
Signed

MID-L-006961-20 10/02/2020 5:25:56 PM Pg 2 of 2 Trans ID: LCV20201750341



**Service of Process
Transmittal**

02/03/2021

CT Log Number 538991813

TO: Legal Sop, Melissa Partlow
Best Buy Enterprise Services, Inc.
7601 PENN AVE S
RICHFIELD, MN 55423-3683

RE: Process Served in New Jersey

FOR: Best Buy (Cross Ref Name) (Domestic State: VA)
Best Buy Stores, L.P. (True Name)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: DAVID DERHI AND TIKVA DERHI, ETC., PLTFS. vs. CHRISTOPH HAMMOND, ET AL.,
DFTS. // TO: BEST BUY

DOCUMENT(S) SERVED: -

COURT/AGENCY: None Specified
Case # MIDL00696120

NATURE OF ACTION: Personal Injury - Vehicle Collision

ON WHOM PROCESS WAS SERVED: C T Corporation System, West Trenton, NJ

DATE AND HOUR OF SERVICE: By Process Server on 02/03/2021 at 15:40

JURISDICTION SERVED : New Jersey

APPEARANCE OR ANSWER DUE: None Specified

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: CT has retained the current log, Retain Date: 02/03/2021, Expected Purge Date:
02/08/2021
Image SOP
Email Notification, Legal Sop ctlegalsop@bestbuy.com

REGISTERED AGENT ADDRESS: C T Corporation System
820 Bear Tavern Road
West Trenton, NJ 08628
866-331-2303
CentralTeam1@wolterskluwer.com

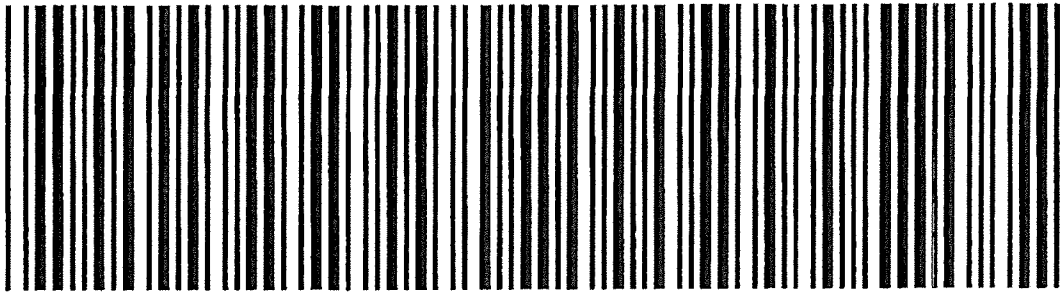
The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



PROCESS SERVER DELIVERY DETAILS

Date: Wed, Feb 3, 2021
Server Name: Drop Service

Entity Served	BEST BUY
Agent Name	
Case Number	MIDL696120
Jurisdiction	NJ



LAW OFFICE OF ANDREW S. BLUMER
A Limited Liability Company
Andrew S. Blumer, Esq.
NJ Attorney ID No. 032631994
4255 Route 9 North, Bldg. 5, Suite D
Freehold, New Jersey 07728
732.303.6430
Attorneys for Plaintiff

DAVID DERHI and TIKVA DERHI,
his wife,

Plaintiffs,

v.

CHRISTOPH HAMMOND; BEST BUY
STORES; BEST BUY; BEST BUY CO.,
INC.; BEST BUY STORES, L.P.; ABC
Corporations (1-10), DEF Partnerships (1-10),
GHI Limited Liability Companies (1-10), and
John/Jane Does (1-10),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-6961-20

CIVIL ACTION

SUMMONS

THE STATE OF NEW JERSEY, to the Above-Named Defendant:

Best Buy

C/o Michael Moran, President
7601 Penn Ave S.
Richfield, MN 55423

The Plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey.

The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written answer or motion and proof of service with the Deputy Clerk of the Superior Court in the County listed above within thirty-five (35) days from the date you received this Summons, not counting the date you received it. A \$135.00 filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the Deputy Clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to Plaintiff's attorney whose name and

address appear above, or to Plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and Case Information Statement) if you want the Court to hear your defense.

If you do not file and serve a written answer or motion within thirty-five (35) days, the Court may enter a judgment against you for the relief Plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford to pay an attorney, you may call the Legal Services Office in the County where you live. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is provided.

/s/ M. M. S
MICHELLE M. SMITH, ACTING CLERK
SUPERIOR COURT OF NEW JERSEY

Dated: January 27, 2021

Name/Address of Defendant to be served:

Best Buy
C/o Michael Moran, President
7601 Penn Ave S.
Richfield, MN 55423

**Directory of Superior Court Deputy Clerk's Offices
County Lawyer Referral and Legal Services Offices**

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401

LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601

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LEGAL SERVICES
(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060

LAWYER REFERRAL
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LEGAL SERVICES
(609) 261-1088

CAMDEN COUNTY:

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Civil Processing Office
Hall of Justice
1st Fl., Suite 150
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Camden, NJ 08103

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LEGAL SERVICES
(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Cape May Court House, NJ 08210

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Hall of Records, Room 201
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PASSAIC COUNTY:

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Court House
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SALEM COUNTY:

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Attn: Civil Case Management Office
92 Market Street
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SOMERSET COUNTY:

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Civil Division
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Somerville, N.J. 08876

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(908) 231-0840

SUSSEX COUNTY:

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860

LAWYER REFERRAL
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UNION COUNTY:

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WARREN COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500

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LAW OFFICE OF ANDREW S. BLUMER
FREEHOLD OFFICE PLAZA
4255 ROUTE 9 NORTH
BLDG. 5, SUITE D
FREEHOLD, NEW JERSEY 07728
(732) 303-6430
Our File No.: BI-DER-001
Andrew S. Blumer, Esq.
Attorney ID# 032631994
Attorneys for Plaintiff(s):

DAVID DERHI and TIKVA DERHI, his
wife
Plaintiffs,

v.

CHRISTOPH HAMMOND; BEST BUY
STORES; BEST BUY; BEST BUY CO.,
INC.; BEST BUY STORES, L.P.; ABC
Corporations (1-10), DEF Partnerships (1-10),
GHI Limited Liability Companies (1-10) and
John/Jane Does (1-10)

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID-L-_____

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff, DAVID DERHI and TIKVA DERHI, residing at 20 Carter Drive, Township of Marlboro County of Monmouth, State of New Jersey, by way of Complaint against the Defendants say:

FIRST COUNT

1. On October 4, 2018 at approximately 2:35 p.m., the Plaintiff, DAVID DERHI, was operating an automobile that was traveling northbound on River Avenue and slowing to stop/stopping in traffic, in the Township of Lakewood, County of Ocean, State of New Jersey.
2. At the time and place aforesaid, Defendants CHRISTOPH HAMMOND was the operator of a vehicle traveling directly behind Plaintiff, in the same lane of traffic.
3. At the same time and place aforesaid, the Defendant, CHRISTOPH HAMMOND

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owed a duty of reasonable care to the Plaintiff, DAVID DERHI, with respect to the operation of the vehicle he was driving.

4. At the time and place aforesaid, Defendants, CHRISTOPH HAMMOND breached this duty of care since he operated his vehicle in a negligent, grossly negligent, and/or reckless manner by, *inter alia*, failing to make proper observations and keep proper attention, failing to keep his/her vehicle under control, following too closely behind the plaintiff, travelling too fast for the circumstances then and there existing, driving distracted and failing to otherwise drive with reasonable and due care under the circumstances since CHRISTOPH HAMMOND failed to control his/her vehicle and struck Plaintiff's vehicle in the rear while the Plaintiff was properly and gradually slowing to stop/stopping in traffic; and/or improperly maintained his vehicle.

5. As a direct and proximate result of the aforesaid negligence, gross negligence and/or recklessness of Defendant CHRISTOPH HAMMOND, Plaintiff, DAVID DERHI, was caused to sustain severe and permanent personal injuries, to suffer from great pain, was forced to seek medical aid and attention, was caused to suffer financial loss including property damage, prevented from attending to his/her usual business and/or employment or other activities, and has been left with permanent injuries and disabilities that will, in the future, cause him/her to suffer great pain, require medical aid and/or attention and will otherwise cause him/her to suffer from said injuries.

WHEREFORE, the Plaintiff, DAVID DERHI, demands judgment against the Defendant, CHRISTOPH HAMMOND and Co-Defendants, individually, jointly, concurrently and severally for damages, compensatory and punitive, interest, attorney's fees, costs of suit, and such other and further relief that the Court may deem just and equitable.

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SECOND COUNT

1. Plaintiffs repeat and incorporate each and every allegation contained within the First Count of the Complaint as if set forth at length herein.

2. At the time and place aforesaid, Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., was/were the owner(s) of the vehicle that was being operated by the Defendant, CHRISTOPH HAMMOND. Further, at all times relevant herein, one or more of said Defendants was/were entities that was/were and is conducting business in Middlesex County, New Jersey.

3. Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., negligently entrusted Defendant, CHRISTOPH HAMMOND, with said vehicle, negligently maintained said vehicle and/or allowed the Defendant, CHRISTOPH HAMMOND, to operate their/its vehicle as its/his/her agent, servant and/or employee.

4. Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., is vicariously liable for any conduct, including negligence, gross negligence and/or recklessness of Defendant, CHRISTOPH HAMMOND.

5. As a direct and proximate result of the aforesaid conduct, including negligence, gross negligence and/or recklessness of the Defendant, CHRISTOPH HAMMOND and Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., Plaintiff, DAVID DERHI, was caused to sustain severe and permanent personal injuries, to suffer from great pain, was forced to seek medical aid and attention, was caused to suffer financial loss including property damage, prevented from attending to his/her usual business and/or employment or other activities, and has been left with permanent injuries and disabilities that will,

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in the future, cause him/her to suffer great pain, require medical aid and/or attention and will otherwise cause him/her to suffer from said injuries.

WHEREFORE, the Plaintiff, DAVID DERHI, demands judgment against the Defendants, Defendants, BEST BUY STORES, BEST BUY, BEST BUY CO., INC., and/or BEST BUY STORES, L.P., and CHRISTOPH HAMMOND, and Co-Defendants, individually, jointly, concurrently and severally for damages, compensatory and punitive, interest, attorney's fees, costs of suit, and such other and further relief that the Court may deem just and equitable.

THIRD COUNT

1. Plaintiffs repeat each and every allegation contained in the First and Second Counts of this Complaint as if the same were set forth verbatim and at length herein.

2. At the time and place aforesaid, the Plaintiff, TIKVAH DERHI, was the lawfully wedded wife of Plaintiff, DAVID DERHI.

3. As a direct and proximate result of the injuries suffered by Plaintiff, DAVID DERHI, as aforesaid, the Plaintiff, TIKVAH DERHI, has and will in the future, suffer the loss of the usual services, companionship, society and consortium of her husband, DAVID DERHI, and has been required to provide special services and care for Plaintiff, DAVID DERHI.

WHEREFORE, the Plaintiff, TIKVAH DERHI, demands judgment against the Defendants and Co-Defendants, individually, jointly, concurrently and severally for damages, interest, attorney's fees, costs of suit, and such other and further relief that the Court may deem just and equitable.

FOURTH COUNT

1. Plaintiffs repeat and incorporate each and every allegation contained within the First, Second and Third Counts of the Complaint as if set forth at length herein.

2. Defendants John/Jane Does (1-10), ABC Corporations (1-10), DEF Partnerships (1-10) and GHI Limited Liability Corporations (1-10) are named fictitiously due to the Plaintiff's lack of knowledge and belief as to the true identities of said Defendants. At such time as the Plaintiff learns the true identities of said Defendants, this Complaint will be amended to reflect same.

3. Defendants John/Jane Does (1-10), ABC Corporations (1-10), DEF Partnerships (1-10) and GHI Limited Liability Companies (1-10) are individuals and/or entities who had an ownership interest in the vehicle that was being operated by Defendant, CHRISTOPH HAMMOND, who negligently entrusted the vehicle to Defendant, CHRISTOPH HAMMOND, who negligently maintained, constructed, assembled and/or repaired the vehicle operated by Defendant, CHRISTOPH HAMMOND, who negligently designed, constructed, obstructed, repaired and/or maintained the roadway where the accident occurred, and/or Defendant, CHRISTOPH HAMMOND, was operating said vehicle as their agent, servant and/or employee at the time of the accident; and/or individually or through their agents, servants and/or employees negligently served alcohol to any of the parties while noticeably intoxicated and/or said Defendants are insurers from whom Plaintiff is entitled to PIP, medical payment coverage or other insurance benefits.

4. As a direct and proximate result of the aforesaid conduct, including negligence of the Defendants, the Plaintiff, DAVID DERHI, was caused to sustain severe and permanent personal injuries, to suffer from great pain, was forced to seek medical aid and attention, was caused to suffer

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financial loss including property damage, prevented from attending to his/her usual business and/or employment or other activities, and has been left with permanent injuries and disabilities that will, in the future, cause him/her to suffer great pain, require medical aid and/or attention and will otherwise cause him/her to suffer from said injuries.

WHEREFORE, the Plaintiff, DAVID DERHI, demand judgment against the Defendants, JOHN/JANE DOES (1-10), ABC Corporations (1-10), DEF Partnerships (1-10), GHI Limited Liability Companies (1-10) and Co-Defendants, individually, jointly, concurrently, severally and individually, for damages, interest, attorney's fees, costs of suit, and such other and further relief that the Court may deem just and equitable.

DESIGNATION OF TRIAL COUNSEL

Andrew S. Blumer, Esq., is hereby designated as trial counsel in the above-captioned matter.

JURY DEMAND

TAKE NOTICE that the Plaintiffs demand that the issues herein be tried by a jury.

CERTIFICATION PURSUANT TO R. 4:5-1

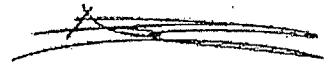
In accordance with Rule 4:5-1, I hereby certify to the best of my knowledge that the matter in controversy in this/her action is not the subject of any other action, and that no such action or arbitration is presently contemplated.

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CERTIFICATION PURSUANT TO RULE 1:38-7(b)

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

LAW OFFICE OF ANDREW S. BLUMER
A LIMITED LIABILITY COMPANY
Attorneys for Plaintiffs


BY: _____
Andrew S. Blumer, Esq.

Dated: October 2, 2020

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Civil Case Information Statement

Case Details: MIDDLESEX Civil Part Docket# L-006961-20

Case Caption: DERHI DAVID VS HAMMOND CHRISTOPH

Case Initiation Date: 10/02/2020

Attorney Name: ANDREW S BLUMER

Firm Name: ANDREW S. BLUMER

Address: BLDG 5, STE D 4255 RTE 9N

FREEHOLD NJ 07728

Phone: 7323036430

Name of Party: PLAINTIFF : DERHI, DAVID

Name of Defendant's Primary Insurance Company

(if known): None

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same
transaction or occurrence)? NO

Are sexual abuse claims alleged by: DAVID DERHI? NO

Are sexual abuse claims alleged by: TIKVA DERHI? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the
court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

10/02/2020

Dated

/s/ ANDREW S BLUMER

Signed

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